

Eastern Slope Rural Telephone Assoc., Inc.

403 3rd Ave., Box 397 • Hugo, Colorado 80821 • 719-743-2441 • www.esrta.com

April 26, 2016

Marlene Dortch Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Connect America Fund, WC Docket, No. 10-90 Re:

Dear Ms. Dortch:

Eastern Slope Rural Telephone Assoc., Inc., ("Eastern Slope"), SAC 462186, is a small RLEC offering traditional voice and broadband services to approximately 3,600 customers in eastern Colorado. Eastern Slope is filing this letter in response to the FCC's Challenge Process to the Competitive Coverage that began with the release of the A-CAM version 2.2.1

Review of the competitive overlap data recently released by the FCC identifies two companies as qualified competitors of Eastern Slope in several census blocks.² Those companies are Comcast Cable (Comcast), and Eastern Colorado Independent Networks, LLC (ECIN). Eastern Slope has verified that neither of these companies meet the FCC requirements of providing both voice service and data service of at least 10/1.

While Comcast does provide limited cable and broadband service in the town of Bennett, CO - it does not provide voice service.3

¹ Connect America Fund, WC Docket No. 10-90. Public Notice Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process. (Rel. April 7,

² Connect America Fund, WC Docket No. 10-90. Public Notice FCC Releases Form 477 Data on Fixed Broadband Deployment as of June 30, 2015. (Rel. March 16, 2016) The FCC noted that the released June 2015 data includes any revisions made by filers before February 19, 2016. ³ See infra at Appendix A, a screenshot of Comcast's website confirming that service is not available.

ECIN is a wireless ISP and does not provide voice service. We have attached confirmation of this from ECIN's manager, Brian Creveling. ⁴

Accordingly, we request that the FCC's Wireline Competition Bureau direct CostQuest to correct the A-CAM to reflect Eastern Slope's lack of competitive overlap by Comcast or ECIN in any census block in its study area. ⁵ Removal of the incorrect competitive overlap of the aforementioned companies is paramount to providing Eastern Slope with accurate A-CAM support amounts, which are necessary to enable an informed election on whether to accept model based support.

Thank you in advance for correcting this matter.

atina L'White

Sincerely,

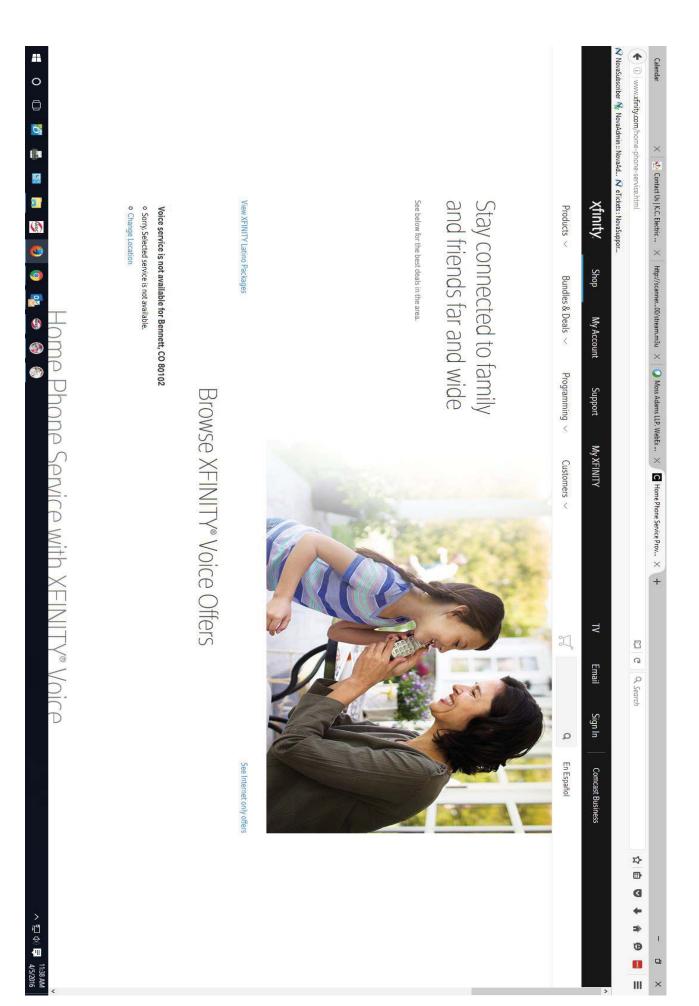
Patricia White General Manager

CC: TCA, Inc. Katie King Suzanne Yellen Alex Minard

⁴ See infra at Appendix B, a letter from ECIN confirming that they do not provide voice service.

⁵ See infra at Appendix C, list of census blocks in Eastern Slope's study area identified by the FCC as excluded from the A-CAM as a result of Comcast, and ECIN incorrectly classified as a qualified competitor.

Appendix A



Appendix B



April 25, 2016

TCA 526 Chapel Hills Drive Colorado Springs, CO 80920 Attn: Kevin Kelly

Re: Eastern Colorado Independent Networks Services

To Whom It May Concern:

Eastern Colorado Independent Networks (ECIN) is an internet service provider, servicing the Interstate 70 corridor in eastern Colorado. ECIN provides high speed internet using a wireless network platform. ECIN does not currently provide any local voice services to any of its customers over the wireless network.

Should you have any questions, please feel free to contact me at <u>creveling@netecin.net</u> or by telephone at (303) 822-9207.

Sincerely,

Brian Creveling General Manager

Eastern Colorado Independent Networks

Appendix C

FRN	ProviderName	StateAbbr	BlockCode
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012009
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012010
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012011
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012017
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012026
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012030
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012037
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012038
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012049
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012050
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012051
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012052
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012053
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012054
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012055
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012057
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012058 80010084012060
	COMCAST CABLE COMMUNICATIONS, LLC COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012060
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012061
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012002
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012100
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012102
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012103
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012104
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012105
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012106
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012107
3768165	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012108
3768165	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012109
3768165	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012110
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012114
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012115
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012116
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012117
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012118
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012119
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012121
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012122
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012123
	COMCAST CABLE COMMUNICATIONS, LLC	СО	80010084012124
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012125
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012126
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012127
	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012128
3768165	COMCAST CABLE COMMUNICATIONS, LLC	CO	80010084012129

FRN ProviderName	StateAbbr	BlockCode
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3768165 COMCAST CABLE COMMUNICATIONS, LLC	СО	80050071011008
3768165 COMCAST CABLE COMMUNICATIONS, LLC	СО	80050071011009
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011001
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011036
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011037
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011041
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011095
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011096
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13321211 Eastern Colorado Independent Networks, LLC	CO CO	80010084011110 80010084011111
13321211 Eastern Colorado Independent Networks, LLC 13321211 Eastern Colorado Independent Networks, LLC	CO	80010084011111
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011168
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011169
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011170
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FRN ProviderName	StateAbbr	BlockCode
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011180
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084011187
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FRN ProviderName	StateAbbr	BlockCode
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13321211 Eastern Colorado Independent Networks, LLC	CO CO	80010084012079 80010084012080
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012102
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012103
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012104
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012106
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012107

FRN ProviderName	StateAbbr	BlockCode
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13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012112
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012113
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012114
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012115
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012116
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012117
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084012118
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012119
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012121
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012122
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012125
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084012126
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021102
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021105
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021106
13321211 Eastern Colorado Independent Networks, LLC	СО	80010084021107
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021126
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FRN ProviderName	StateAbbr	BlockCode
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021379
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021380
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021381
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021382
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13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021400
13321211 Eastern Colorado Independent Networks, LLC	CO	80010084021401
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13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011021
13321211 Eastern Colorado Independent Networks, LLC	CO CO	80050071011034
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011076 80050071011077
13321211 Eastern Colorado Independent Networks, LLC 13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011077
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011078
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011079
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011080
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011081
13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011082
13321211 Lastern Colorado macpenacht Networks, LLC		00030071011003

FRN ProviderName	StateAbbr	BlockCode
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13321211 Eastern Colorado Independent Networks, LLC	СО	80050071011088
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13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011095
13321211 Eastern Colorado Independent Networks, LLC	СО	80050071011096
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13321211 Eastern Colorado Independent Networks, LLC	CO	80050071011108
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13321211 Lustern colorado macpenaem Networks, LLC		00030071031020

FRN	ProviderName	StateAbbr	BlockCode
13321211	Eastern Colorado Independent Networks, LLC	СО	80050071031021
13321211	Eastern Colorado Independent Networks, LLC	CO	80050071031022
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13321211	Eastern Colorado Independent Networks, LLC	CO	80739618002661